

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

CESAR SIFUENTES,

Plaintiff,

v.

Case No. 10-C-75

AMERICAN CYANAMID CO., et al.

Defendants.

SPECIAL VERDICT

Question 1: Did plaintiff Cesar Sifuentes ingest white lead carbonate pigment?

Answer: Yes
Yes or No

If your answer to Question 1 is "no," then do not answer any other question. Proceed to the final page and sign/date this form.

If you answer Question 1 "yes," then answer Question 2.

Question 2: Did Sifuentes's ingestion of white lead carbonate cause an injury?

Answer: Yes
Yes or No

If the answer to Question 2 is "no," do not answer any other question. Proceed to the final page and sign/date this form.

If you answer Question 2 "yes," then answer Question 3.

Question 3: Answering separately for each defendant listed below, did the defendant prove that it did not produce or market white lead carbonate ingested by Sifuentes?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes _____ No X
- c. E.I. du Pont de Nemours Company
Yes _____ No X
- d. Sherwin-Williams Company
Yes _____ No X

If you answered "yes" as to any defendant in question 3, answer no further questions as to that defendant.

Considering only those defendants for whom you answered "no" in Question 3, answer Questions 4 and 5:

Question 4: Answering separately for each defendant, was the defendant negligent in producing or marketing white lead carbonate?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

Question 5: Answering separately for each defendant listed below, was the white lead carbonate manufactured and sold by the defendant defective and unreasonably dangerous due to inadequate warnings at the time the product was sold?

- a. Atlantic Richfield
Yes _____ No X
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

Considering only those defendants for whom you answered "yes" to question 5, answer Question 6:

Question 6: Answering separately for each defendant listed below, were the defendant's inadequate warnings a cause of Sifuentes's injuries?

- a. Atlantic Richfield
Yes _____ No _____
- b. Armstrong Containers, Inc.
Yes X No _____
- c. E.I. du Pont de Nemours Company
Yes X No _____
- d. Sherwin-Williams Company
Yes X No _____

If you answered "yes" as to any defendant on Question 4 or Question 6, then answer Question 7:

Question 7: What amount of money will fairly compensate Sifuentes for his injuries caused by ingesting white lead carbonate:

\$ 2,000,000.

Question 8: Was the landlord, Ricardo Pacheco, negligent with respect to Sifuentes's ingestion of white lead carbonate?

Yes _____ No X

If you answered "yes" to Question 8, then answer Question 9.

Question 9: Was the negligence on the part of Mr. Pacheco a cause of any injury you found in Question 2?

Yes _____ No _____

If you answered "yes" to Question 9, then answer Question 10.

Question 10: Assuming the total responsibility for causing the injuries to Sifuentes due to the ingestion of white lead carbonate pigment to be 100%, what percentage of the total responsibility do you attribute to:

Mr. Pacheco: 0 %

The total percentage
for defendants for whom
you answered "yes" in
question 4 and/or 6. 100 %

Each juror should sign this verdict form.

